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August 5, 2020

VIA ECF and E-Mail

The Honorable Vernon S. Broderick  
United States District Court  
for the Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 415  
New York, New York 10007

APPLICATION GRANTED  
SO ORDERED   
VERNON S. BRODERICK  
U.S.D.J. 8/7/2020

The filing at Document 92 shall remain visible only to the  
selected parties.

**Re: *Spectrum Dynamics Medical Limited v. General Electric Company, et al.,***  
**Civil Action No. 18-cv-11386 (VSB)**

Dear Judge Broderick:

We represent Plaintiff Spectrum Dynamics Medical Limited (“Plaintiff” or “Spectrum”) in the above-referenced action. On behalf of Plaintiff, we write pursuant to Rule 5.B of your Honor’s Individual Rules & Practices in Civil Cases to respectfully request permission to file Plaintiff’s Reply and Counterclaims to the Answer, Affirmative Defenses, and Amended Counterclaims of Defendants under seal and in redacted form.

Plaintiff respectfully requests a few minor redactions of limited nature affecting only paragraph 18 (in the section pertaining to the Answer) and paragraphs 35, 99, 131, 139, and 140 as well as the corresponding images (in the section pertaining to the Counterclaims) of Plaintiff’s Reply and Counterclaims. Plaintiff’s requested redactions consist of references to and descriptions of Plaintiff’s trade secrets, and are consistent with its redactions in its previous pleadings, including its First Amended Complaint [D.I. 37].

Plaintiff’s counsel has conferred with Defendants’ counsel who does not object to the instant request.

The Honorable Vernon S. Broderick

August 5, 2020

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Plaintiff's proposed redactions are highlighted in yellow in the enclosed copy of Plaintiff's Reply and Counterclaims to the Answer, Affirmative Defenses, and Amended Counterclaims of Defendants.

For the aforementioned reasons, Plaintiff respectfully requests permission from this Court to file its Reply and Counterclaims to the Answer, Affirmative Defenses, and Amended Counterclaims of Defendants under seal and in redacted form.

Respectfully submitted,

*/s/ Neil F. Greenblum*

Neil F. Greenblum

cc: All counsel of record (via email and ECF)